

# **EXHIBIT 42**

# EXHIBIT 43

## ADELANTO / ICE PROCESSING CENTER (DETAINEE REQUEST FORM - KITE)

Ornela Rive en Martinez El Salvador  
 Detainee Name Nationality

213081649  
 ICE A#

TIME/DATE STAMP

W4-101-10  
 Dorm

7-3-2017  
 Date

[Signature]  
 Officer Signature

## MARK YOUR REQUEST

- ☐ LIBRARY  
☐ PHONE CALL

Telephone number/Numero de teléfono

## MARQUE SU PEDIMENTO

- ☐ BIBLIOTECA  
☐ LLAMADAS TELEFÓNICAS

Other Request:

OK solicito que me  
 desbloqueen los nú  
 meros de telefono de mi esposa y mi  
 hija estan violando mi derecho

## RESPONSE:

y de mi abogado. los demandare  
 T15 239-580 8349 - y 239-244-5700  
 y 6192729065

Completed YES ☐ NO ☐ BY: \_\_\_\_\_ DATE: \_\_\_\_\_

P000461

ADELANTO / ICE PROCESSING CENTER (DETAINEE REQUEST FORM - KITE)			JUL 6'17 RCVD			
<p><u>Omar (P. Rivera Martinez)</u></p> <p><small>Detainee Name</small></p>	<p><u>El Salvador</u></p> <p><small>Nationality</small></p>	<p><u>2130 81649</u></p> <p><small>ICE A#</small></p>	<p>TIME/DATE STAMP</p>			
<p><u>W4-101-10</u></p> <p><small>Dorm</small></p>	<p><u>7-3-2017</u></p> <p><small>Date</small></p>	<p><u>[Signature]</u></p> <p><small>Officer Signature</small></p>				
<table border="0" style="width: 100%;"> <tr> <td style="width: 33%;"> <b>MARK YOUR REQUEST</b>  <input type="checkbox"/> LIBRARY  <input type="checkbox"/> PHONE CALL  <small>Telephone number/Numero de teléfono</small> </td> <td style="width: 33%;"> <b>MARQUE SU PEDIMENTO</b>  <input type="checkbox"/> BIBLIOTECA  <input type="checkbox"/> LLAMADAS TELEFÓNICAS  <small>pasando</small> </td> <td style="width: 34%;"> <b>Other Request:</b>  <p>OK se estan sobre necesito hablar con mi Ice (Jimeno) de inmediato</p> </td> </tr> </table>				<b>MARK YOUR REQUEST</b> <input type="checkbox"/> LIBRARY <input type="checkbox"/> PHONE CALL <small>Telephone number/Numero de teléfono</small>	<b>MARQUE SU PEDIMENTO</b> <input type="checkbox"/> BIBLIOTECA <input type="checkbox"/> LLAMADAS TELEFÓNICAS <small>pasando</small>	<b>Other Request:</b> <p>OK se estan sobre necesito hablar con mi Ice (Jimeno) de inmediato</p>
<b>MARK YOUR REQUEST</b> <input type="checkbox"/> LIBRARY <input type="checkbox"/> PHONE CALL <small>Telephone number/Numero de teléfono</small>	<b>MARQUE SU PEDIMENTO</b> <input type="checkbox"/> BIBLIOTECA <input type="checkbox"/> LLAMADAS TELEFÓNICAS <small>pasando</small>	<b>Other Request:</b> <p>OK se estan sobre necesito hablar con mi Ice (Jimeno) de inmediato</p>				
<p><b>RESPONSE:</b></p> <p>necesito que desbloqueen mis Numeros OK. (por favor llene un ICE KITE para su solicitud)</p>						
<p>Completed YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> BY: <u>[Signature]</u> DATE: <u>7-6-17</u></p>						

# **EXHIBIT 44**

# EXHIBIT 45



1132 Orange AV  
Long Beach CA  
90813

- Carta de Support Notariado  
- Copia de "ID" Ciudadano o Residente  
- Copia de bill-Luz o Agua domicilio  
- Copia de talla de cheque

Snap Map  
Voces del interno  
AVABA Solo #1 Col. Chalala  
Sanate Pcc Santo domingo  
Oxaca

Febrero 4-2016

Alex: \$60349160X Sagelin Mendez

Ecuman Isaac

Felipe: \$154311623X 714 600 1119

8162136825 X

Mica: \$8183716503X MAMA' X

Ariel

Robert: \$8582018117X 7000-8416X

6179539573X

Ester: \$475857462X Joselin X

Roberto

7935-3735 X

8583767054X

Abogad: \$2132223723X MAMA guille X

Casa-Ester X

Jose: 7448-3004 994 1014054X

3475857462X

Cony: 6679953232X 323984 6097

Comisaria. X

Sorag: Univision X Pedro Manciana

866 3451884 X

3052759206X Felicit Alex X

Chari Zuzaya

3056080826X 7603328631X

5528462599

Jose: 5626064360X 3238234028X

Tuanita

Jose yomper X 2135729454X

994 101 6227

9493225376X 2028419788X



# EXHIBIT 46



## CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

W/O 253050

MONTHLY H<sub>2</sub>O TEMP TESTS-MEDICAL EAST

	Temperature		Temperature
<b>Unit 1:</b>		<b>ICE Holding</b>	
1A	110°	<b>Kitchen:</b>	
1B	112°	Sink 1 by Dishwasher	118°
1C	113°	Sink 2 by Baking	117°
1C	112°	Sink 3 Table by Skillets	119°
Janitorial Closet	114°	Sink 4 Table by Ovens	119°
Bubble	110°	Sink 5 Table by Prep	118°
Staff Bath	108°	Sink 6, 3 Sink area	117°
Yard	107°	3 Sink	n/a
	n/a	Sink 7, 2 Sink	118°
Processing Center	n/a	2 Sink	n/a
		Sink 8 by Office	116°
<b>Medical:</b>		Staff Bathroom	116°
Isolation Cell	104°	Detainee Bathroom	116°
Telemedicine	113°		
Bathroom	110°	<b>Laundry:</b>	
Mental Health	113°	Bathroom	115°
Exam 1	113°	Sink	115°
Exam 2	113°		
Lab/Exam 3	113°	<b>Lobby:</b>	
Pharmacy	112°	Mens	107°
		Womens	106°
<b>Dental:</b>		<b>Unit 2:</b>	
Exam	109°	2A	111°
Lab	109°	2B	112°
		2C	112°
<b>Staff Bathrooms:</b>		Janitorial Closet	116°
Mens	104°	Bubble	113°
Womens	105°	Staff Bath	110°
		Yard	105°
Medical Holding	101°		
Detainee Waiting	103°	<b>Admin:</b>	
<b>Intake:</b>		GEO Mens	106°
Holding 1	105°	GEO Womens	107°
Holding 2	105°	GEO Breakroom	110°
Exam	no ACCESS	Maintenance	114°
Cell 1	Storage	Warehouse	no ACCESS
Cell 2	Storage	ICE Mens	112°
Cell 3	Storage	ICE Womens	112°
Cell 4	Storage	ICE Breakroom	114°
Cell 5	Storage		
Shower 1	102°	<b>Training:</b>	
Shower 2	101°	Mens	no hot water
		Womens	no hot water
Date:	7.3-17		
Inspected By:	11/26/19		

## CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

MONTHLY H<sub>2</sub>O TEMP TESTS EAST

	Temperature		Temperature
<b>Unit 1:</b>		<b>ICE Holding</b>	
1A	114°		
1B	115°	<b>Kitchen:</b>	
1C	114°	Sink 1 by Dishwasher	120°
1D	114°	Sink 2 by Baking	120°
Janitorial Closet	116°	Sink 3 Table by Skillets	119°
Bubble	105°	Sink 4 Table by Ovens	119°
Staff Bath	104°	Sink 5 Table by Prep	120°
Yard	102°	Sink 6, 3 Sink area	120°
Processing Center	n/a	Sink 7, 2 Sink	119°
<b>Medical:</b>		Sink 8 by Office	119°
Isolation Cell	106°	Staff Bathroom	119°
Telemedicine	115°	Detainee Bathroom	119°
Bathroom	107°		
Mental Health	115°	<b>Laundry:</b>	
Exam 1	114°	Bathroom	114°
Exam 2	114°	Sink	114°
Lab/Exam 3	114°		
Pharmacy	114°	<b>Lobby:</b>	
		Mens	104°
<b>Dental:</b>		Womens	104°
Exam	106°		
Lab	106°	<b>Unit 2:</b>	
<b>Staff Bathrooms:</b>		2A	115°
Mens	107°	2B	115°
Womens	107°	2C	115°
		Janitorial Closet	115°
<b>Medical Holding</b>	101°	Bubble	114°
		Staff Bath	109°
<b>Detainee Waiting</b>	104°	Yard	102°
		<b>Admin:</b>	
<b>Intake:</b>		GEO Mens	111°
Holding 1	102°	GEO Womens	110°
Holding 2	103°	GEO Breakroom	112°
Shower 1	103°	Maintenance	112°
Shower 2	103°	Warehouse	no access
		ICE Mens	111°
		ICE Womens	116°
		ICE Breakroom	111°

Date: 6-25-17

Inspected By: 160105



## CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

W/O 222564

MONTHLY H<sub>2</sub>O TEMP TESTS-MEDICAL EAST

	Temperature		Temperature
<b>Unit 1:</b>		<b>ICE Holding</b>	<b>104°</b>
1A	111°		
1B	112°	<b>Kitchen:</b>	
1C	111°	Sink 1 by Dishwasher	118°
1C	111°	Sink 2 by Baking	117°
Janitorial Closet	114°	Sink 3 Table by Skillets	119°
Bubble	116°	Sink 4 Table by Ovens	119°
Staff Bath	111°	Sink 5 Table by Prep	118°
Yard	106°	Sink 6, 3 Sink area	
	N/A	3 Sink	118°
Processing Center	N/A	Sink 7, 2 Sink	
		2 Sink	118°
<b>Medical:</b>		Sink 8 by Office	117°
Isolation Cell	103°	Staff Bathroom	118°
Telemedicine	113°	Detainee Bathroom	117°
Bathroom	106°		
Mental Health	112°	<b>Laundry:</b>	
Exam 1	113°	Bathroom	114°
Exam 2	114°	Sink	115°
Lab/Exam 3	114°		
Pharmacy	114°	<b>Lobby:</b>	
		Mens	110°
<b>Dental:</b>		Womens	110°
Exam	NO ACCESS		
Lab	NO ACCESS	<b>Unit 2:</b>	
		2A	108°
<b>Staff Bathrooms:</b>		2B	109°
Mens	N/A	2C	109°
Womens	1	Janitorial Closet	112°
		Bubble	110°
Medical Holding	104°	Staff Bath	110°
		Yard	106°
Detainee Waiting	101°		
		<b>Admin:</b>	
<b>Intake:</b>		GEO Mens	109°
Holding 1	106°	GEO Womens	108°
Holding 2	106°	GEO Breakroom	111°
Exam	NO ACCESS	Maintenance	114°
Cell 1	Storage	Warehouse	NO ACCESS
Cell 2	Storage	ICE Mens	109°
Cell 3	Storage	ICE Womens	109°
Cell 4	Storage	ICE Breakroom	111°
Cell 5	Storage		
Shower 1	104°	<b>Training:</b>	
Shower 2	105°	Mens	no Hot water
		Womens	no Hot water

Date: 5/26/17

Inspected By: W. King

## CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

W/0253171

WEEKLY H<sub>2</sub>O TEMP TESTS-MEDICAL EAST

Temperature Range 100°-120°		Temperature Range 100°-120°	
<b>MEDICAL:</b>		<b>DENTAL:</b>	
Restroom	<u>110°</u>	Exam	<u>109°</u>
Mental Health	<u>113°</u>	Lab	<u>109°</u>
Exam 1	<u>113°</u>		
Exam 2	<u>113°</u>		
Lab/Exam 3	<u>113°</u>		
Pharmacy	<u>112°</u>		
Telemedicine	<u>113°</u>		
Holding	<u>102°</u>		
Isolation Cell	<u>105°</u>		

Comments/Findings:

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Inspected By:

Kearns

Date:

7-3-17



## CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

w/c 238365

WEEKLY H<sub>2</sub>O TEMP TESTS-MEDICAL EAST

MEDICAL:		Temperature Range 100°-120°	DENTAL:		Temperature Range 100°-120°
Restroom		<u>106°</u>	Exam		<u>NO ACCESS</u>
Mental Health		<u>112°</u>	Lab		<u>NO ACCESS</u>
Exam 1		<u>112°</u>			
Exam 2		<u>111°</u>			
Lab/Exam 3		<u>112°</u>			
Pharmacy		<u>111°</u>			
Telemedicine		<u>112°</u>			
Holding		<u>102°</u>			
Isolation Cell		<u>106°</u>			

Comments/Findings:

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Inspected By: LeasDate: 6-3-17

## CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

w/o 238362

WEEKLY H<sub>2</sub>O TEMP TESTS-MEDICAL EAST

MEDICAL:		Temperature Range 100°-120°	DENTAL:		Temperature Range 100°-120°
Restroom		<u>106°</u>	Exam		<u>NO ACCESS</u>
Mental Health		<u>112°</u>	Lab		<u>NO ACCESS</u>
Exam 1		<u>113°</u>			
Exam 2		<u>113°</u>			
Lab/Exam 3		<u>114°</u>			
Pharmacy		<u>114°</u>			
Telemedicine		<u>114°</u>			
Holding		<u>104°</u>			
Isolation Cell		<u>103°</u>			

Comments/Findings:

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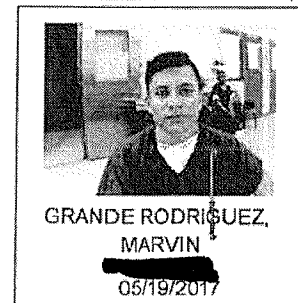
Inspected By: HeaseDate: 5-21-17



# EXHIBIT 47

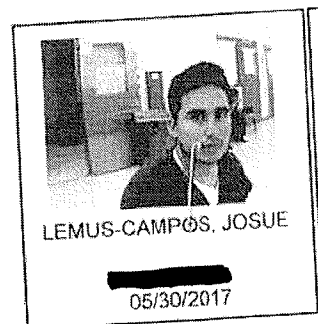
Subject ID: [REDACTED]

ORDER TO DETAIN OR RELEASE ALIEN					
TO: (NAME and TITLE of Person in Charge of Facility) JAMES JANECKA, WARDEN					
(Name of Facility) ADELANTO DETENTION FACILITY 10400 RANCHO RD. ADELANTO, CA 92301 US					
Please <input checked="" type="checkbox"/> Detain <input type="checkbox"/> Release				Date 05/19/2017	Time 12:00 AM
Name of Alien GRANDE RODRIGUEZ, MARVIN JOSUE				File Number [REDACTED] Event No. [REDACTED]	
Age [REDACTED]	Date of Birth (Mo.Day.Yr.) [REDACTED]	Sex M	Nationality EL SALVADOR	Foreign Address [REDACTED]	
Nature of Proceedings ER-CF (EL SALVADOR) HOLD FOR REMOVAL PROCEEDINGS			Signature of Officer Receiving Alien <i>Castillo</i>		
REMARKS: SUBJECT ID: [REDACTED] [REDACTED] <i>05/19/17 @ 1259</i>					
Signature of Officer Authorizing Action <i>[Signature]</i>			Title SDDO		
Form I-203 (Rev. 08/01/07)					
UNITED STATES DEPARTMENT OF HOMELAND SEC					



GEO 01882

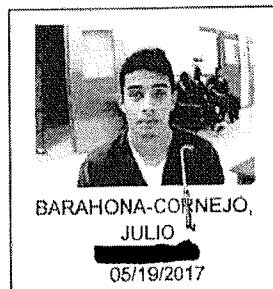
ORDER TO DETAIN OR RELEASE ALIEN					
TO: (NAME and TITLE of Person in Charge of Facility) JAMES JANECKA, WARDEN					
(Name of Facility) ADELANTO DETENTION FACILITY					
Please <input checked="" type="checkbox"/> Detain <input type="checkbox"/> Release				Date 5/30/2017	Time
Name of Alien LEMUS-CAMPOS, JOSUE				File Number A# [REDACTED]	
Age	Date of Birth (Mo.Day.Yr.)	Sex	Nationality	Foreign Address	
	[REDACTED]	M	EL SAL		
Nature of Proceedings			Signature of Officer Receiving Alien <i>Ameli</i>		
REMARKS:  S. 30.17 @ 1400					
Signature of Officer Authorizing Action <i>[Signature]</i>			Title Deportation Officer		
Form I-203 (Rev. 08/01/07)					
UNITED STATES DEPARTMENT OF HOMELAND S					





Subject ID: [REDACTED]

ORDER TO DETAIN OR RELEASE ALIEN					
TO: (NAME and TITLE of Person in Charge of Facility) James Janecka, Warden					
(Name of Facility) ADELANTO DETENTION FACILI 10400 RANCHO RD. ADELANTO, CA 92301 US					
Please <input checked="" type="checkbox"/> Detain <input type="checkbox"/> Release				Date 05/19/2017	Time 12:00 AM
Name of Alien BARAHONA-CORNEJO, JULIO CESAR				File Number [REDACTED] Event No [REDACTED]	
Age [REDACTED]	Date of Birth (Mo.Day.Yr.) [REDACTED]	Sex M	Nationality EL SALVADOR	Foreign Address [REDACTED]	
Nature of Proceedings			Signature of Officer Receiving Alien <i>T. Brown</i>		
REMARKS:  <i>05/19/17 @1259</i>					
Signature of Officer Authorizing Action <i>[Signature]</i>			Title SDDO		
Form I-203 (Rev. 08/01/07)					
UNITED STATES DEPARTMENT OF HOMELAND SE					



GEO 01518

Subject ID: [REDACTED]

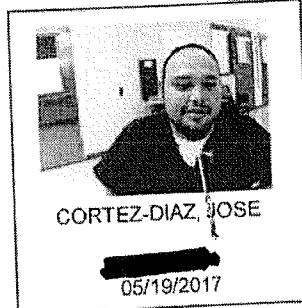
ORDER TO DETAIN OR RELEASE ALIEN					
TO: (NAME and TITLE of Person in Charge of Facility) JAMES JANECKA, WARDEN					
(Name of Facility) ADELANTO DETENTION FACILITY 10400 RANCHO RD. ADELANTO, CA 92301 US					
Please <input checked="" type="checkbox"/> Detain <input type="checkbox"/> Release					Date 5.24.17
Name of Alien BURGOS-MEJIA, ALEXANDER ANTONIO					File Number [REDACTED] Event No. [REDACTED]
Age [REDACTED]	Date of Birth (Mo.Day.Yr.) [REDACTED]	Sex M	Nationality HONDURAS	Foreign Address [REDACTED]	
Nature of Proceedings			Signature of Officer Receiving Alien Tusk		
REMARKS:  5.24.17 @ 1040					
Signature of Officer Authorizing Action [REDACTED]			Title DO		
Form I-203 (Rev. 08/01/07)					
UNITED STATES DEPARTMENT OF HOMELAND SECURITY					



GEO 00897

Subject ID: [REDACTED]

ORDER TO DETAIN OR RELEASE ALIEN					
TO: (NAME and TITLE of Person in Charge of Facility) James Janecka, Warden					
(Name of Facility) ADELANTO DETENTION FACILITY 10400 RANCHO RD. ADELANTO, CA 92301 US					
Please <input checked="" type="checkbox"/> Detain <input type="checkbox"/> Release				Date 05/19/2017	Time 12:00 AM
Name of Alien CORTEZ-DIAZ, JOSE				File Number [REDACTED] Event No. [REDACTED]	
Age [REDACTED]	Date of Birth (Mo.Day.Yr.) [REDACTED]	Sex M	Nationality EL SALVADOR	Foreign Address [REDACTED]	
Nature of Proceedings			Signature of Officer Receiving Alien <i>T. Brown</i>		
REMARKS:  <i>05/19/17 @ 1259</i>					
Signature of Officer Authorizing Action <i>[Signature]</i>			Title SDDO		
Form I-203 (Rev. 08/01/07)					
UNITED STATES DEPARTMENT OF HOMELAND SECURITY					

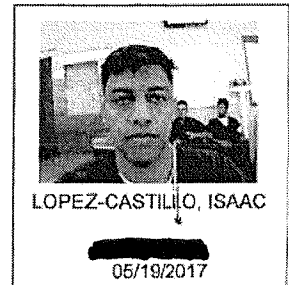


GEO 01347



Subject ID: [REDACTED]

ORDER TO DETAIN OR RELEASE ALIEN					
TO: (NAME and TITLE of Person in Charge of Facility) JAMES JANECKA, WARDEN					
(Name of Facility) ADELANTO DETENTION FACILI 10400 RANCHO RD. ADELANTO, CA 92301 US					
Please <input checked="" type="checkbox"/> Detain <input type="checkbox"/> Release				Date 05/19/2017	Time 12:00 PM
Name of Alien LOPEZ-CASTILLO, ISAAC ANTONIO				File Number Event No. [REDACTED]	
Age [REDACTED]	Date of Birth (Mo.Day.Yr.) [REDACTED]	Sex M	Nationality EL SALVADOR	Foreign Address [REDACTED]	
Nature of Proceedings [REDACTED]			Signature of Officer Receiving Alien <i>Castillo</i>		
REMARKS:  <i>05/19/17 @ 1259</i>					
Signature of Officer Authorizing Action <i>[Signature]</i>			Title SDDO		
Form I-203 (Rev. 08/01/07)					
UNITED STATES DEPARTMENT OF HOMELAND SE					



GEO 01081


Subject ID: [REDACTED]

ORDER TO DETAIN OR RELEASE ALIEN					
TO: (NAME and TITLE of Person in Charge of Facility) James Janicka, Warden					
(Name of Facility) AMELANTO DETENTION FACILITY 10400 RANCHO RD. ADELANTO, CA 92301 US					
Please <input checked="" type="checkbox"/> Detain <input type="checkbox"/> Release					Date 5-19-17
Name of Alien RIVERA-MARTINEZ, OMAR ARNOLDO					File Number [REDACTED] Event No. [REDACTED]
Age [REDACTED]	Date of Birth (Mo., Day, Yr.) [REDACTED]	Sex M	Nationality EL SALVADOR	Foreign Address [REDACTED]	
Nature of Proceedings [REDACTED]			Signature of Officer Receiving Alien Nowicki		
REMARKS:  05/19/17 @ 1259					
Signature of Officer Authorizing Action [Signature]			Title SDDO		
Form I-203 (Rev. 08/01/07)					
UNITED STATES DEPARTMENT OF HOMELAND S					



Subject ID: [REDACTED]

ORDER TO DETAIN OR RELEASE ALIEN					
TO: (NAME and TITLE of Person in Charge of Facility) James Janecka: <i>Warden</i>					
(Name of Facility) <i>Adelanto Detention Facility</i>					
Please <input checked="" type="checkbox"/> Detain <input type="checkbox"/> Release					Date <i>05-19-17</i>
Name of Alien PENA-GARCIA, LUIS ERNESTO					File Number [REDACTED]
Age [REDACTED]	Date of Birth (Mo.Day.Yr.) [REDACTED]	Sex M	Nationality EL SALVADOR	Foreign Address [REDACTED]	
Nature of Proceedings [REDACTED]			Signature of Officer Receiving Alien <i>Torres</i>		
REMARKS:  <i>05/19/17@1259</i>					
Signature of Officer Authorizing Action <i>[Signature]</i>			Title DEPORTATION OFFICER		
Form I-203 (Rev. 08/01/07)					
UNITED STATES DEPARTMENT OF HOMELAND S					



PENA-GARCIA, LUIS  
[REDACTED]  
05/19/2017



# EXHIBIT 48



June 30, 2017

David A. Marin  
Field Office Director  
U.S. Immigration and Customs Enforcement  
Department of Homeland Security  
300 N. Los Angeles Street  
Los Angeles, CA 90012  
david.a.marin@ice.dhs.gov

Gabriel Valdez  
Assistant Field Office Director  
U.S. Immigration and Customs Enforcement  
Adelanto Detention Center  
10400 Rancho Road  
Adelanto, CA 92301  
Gabriel.A.Valdez@ice.dhs.gov

**RE: Mistreatment of detainees participating in a hunger strike at Adelanto  
Detention Facility**

Dear Mr. Marin and Mr. Valdez,

We write regarding our serious concerns about the mistreatment of nine detainees at Adelanto Detention Facility who have been engaged in a peaceful hunger strike to protest the conditions of their confinement.

We are especially concerned with reports that GEO staff used excessive force against the detainees by physically assaulting and using pepper spray against detainees after they announced their hunger strike. Such excessive force against detainees violates the ICE detention standards<sup>1</sup> and detainees' constitutional rights.<sup>2</sup> ICE and GEO staff have also engaged in a troubling pattern of retaliation against the detainees for exercising their constitutional right to free speech under the First Amendment.<sup>3</sup>

We urge ICE and GEO to take immediate steps to put a stop to the ongoing mistreatment of the hunger strikers, and initiate disciplinary proceedings for staff responsible for the abuse. ICE should also meet with the detainees to address their mistreatment and to discuss the grievances that led them to initiate the hunger strike.

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<sup>1</sup> 2011 ICE Performance-Based National Detention Standards (as revised in 2016) ("2011 ICE PBNDS"), at § 2.15(V)(A)-(B).

<sup>2</sup> *Graham v. Connor*, 490 U.S. 386 (1989).

<sup>3</sup> *Pell v. Procunier*, 417 U.S. 817 (1974).

**P000004**

**I. June 12<sup>th</sup>, 2017 Assault and Subsequent Retaliatory Actions Against Hunger Striking Detainees**

On Monday, June 12<sup>th</sup>, 2017, a group of nine detainees at Adelanto Detention Facility began a hunger strike. During that morning's breakfast, the detainees attempted to deliver a letter of grievances regarding their conditions of confinement to ICE officials and requested a meeting with ICE. The detainees also refused food. In response, GEO staff ordered the detainees to return to their assigned beds for the morning count. The detainees joined arms with each other and informed detention staff that they would not move from the breakfast table where they sat until ICE spoke to them about their concerns.

In response to the detainees' peaceful protest, a GEO officer screamed at the detainees and then began to pepper spray them. The detainees report that the officer unloaded a canister of pepper spray on them, leaving them drenched in the pepper spray. One detainee reports that he was sprayed on his genitals. A group of guards then surrounded the detainees and used physical force to restrain them. The detainees report that they were hit and slammed against the wall. One detainee reports that GEO staff pushed him against the wall with such force that it knocked out a dental crown from his mouth and fractured his nose. At no time did the detainees assault or retaliate against the guards.

The detainees were then handcuffed and forcibly removed from the dining hall. They were taken to the shower, where they were doused with painfully hot water that further inflamed their irritated skin. After showering, the detainees were placed in segregation cells.

The detainees continued to be held in segregation for the following 10 days. Initially, the detainees were held in administrative segregation pending disciplinary proceedings; after the completion of the proceedings, the detainees were kept in disciplinary segregation as punishment. Throughout their stay in segregation, they report receiving threats from GEO and ICE officials due to their participation in the hunger strike. According to reports, a guard visited the detainees around June 12<sup>th</sup> and informed the detainees that they could be transferred to another detention facility if they continued the hunger strike. Facility staff have also reportedly threatened the detainees that their participation in the hunger strike would be revealed to the Immigration Judge presiding over their bond determination and removal hearings if they did not stop the hunger strike. The detainees also report being taunted by guards with platters of food. Finally, facility staff have limited the detainees' ability to communicate with people outside the facility, including their counsel.

**II. ICE and GEO's Mistreatment of The Hunger Strikers Violates Their Constitutional Rights and the Detention Standards**

ICE and GEO's use of excessive force and retaliatory actions against the detainees violate their constitutional rights and the ICE detention standards.

**A. Detention Guards Used Excessive Force Against Peacefully Protesting Detainees in Violation of their Fourth Amendment Rights and ICE Detention Standards**



i. *Fourth Amendment Rights Violation*

Immigration detainees are entitled to protection from excessive force. The question of whether a detention officer has used excessive force is analyzed under the Fourth Amendment's objective "reasonableness" standard.<sup>4</sup> The Fourth Amendment sets the applicable constitutional limitations for considering claims of excessive force during pretrial detention. *Kingsley v. Hendrickson*, -- U.S. --, 135 S.Ct. 2466 (2015); *Gibson v. County of Washoe, Nev.*, 290 F.3d 1175, 1197 (9th Cir. 2002). Because they are held in civil custody, immigration detainees are entitled to treatment "at least as solicitous to the rights of the detainee as . . . an individual accused but not convicted of a crime." See *Jones v. Blanas*, 393 F.3d 918, 932 (9th Cir. 2004).

In evaluating excessive force claims under the Fourth Amendment, courts may consider the severity of the violation at issue, whether the individual poses an immediate threat to the safety of the officers or others, and whether the individual is actively resisting or fleeing. *Graham*, 490 U.S. at 396.

There is no question that GEO staff's pepper spraying of detainees engaged in a peaceful protest was excessive under the foregoing standards. It is well-established that the use of pepper spray can constitute excessive force.<sup>5</sup> "Pepper spray is designed to cause intense pain, and inflicts a burning sensation that causes mucus to come out of the nose, an involuntary closing of the eyes, a gagging reflex, and temporary paralysis of the larynx, as well as disorientation, anxiety, and panic." *Young v. Cty. of Los Angeles*, 655 F.3d 1156, 1162 (9th Cir. 2011) (internal quotations and citation omitted).<sup>6</sup> Because of its severe effects, the Ninth Circuit has held that police officers' use of pepper spray on peaceful protestors—who had locked arms using restraints and refused officers' orders to leave the protest site—was plainly excessive, and no reasonable officer could conclude otherwise. *Headwaters Forest Defense v. County of Humboldt*, 276 F.3d 1125, 1131 (9th Cir. 2002).<sup>7</sup> Here too, the "the pepper spray was unnecessary to subdue, remove, or arrest the protestors" and "the officers could safely and quickly remove the protestors" using less severe methods. *Id.*

GEO staff also used excessive force by physically striking the detainees and slamming them against the wall, resulting in serious injuries to at least one detainee. Even if the detainees failed to obey a lawful order to disperse and attend morning count, that does not justify physically assaulting them. The Ninth Circuit has held that an officer's use of pepper spray and baton blows in response to a person's failure to obey an order would be "plainly in excess of the force necessary under the circumstances," and thus excessive under the Fourth Amendment. *Young*, 655 F.3d at 1167.

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<sup>4</sup> *Graham*, 490 U.S. at 386.

<sup>5</sup> See *Lolli v. County of Orange*, 351 F.3d 410, 417 (9th Cir. 2003); *Smith v. City of Hemet*, 394 F.3d 689 (9th Cir. 2005); *Cabral v. County of Glenn*, 624 F.Supp.2d 1184 (EDCA 2009).

<sup>6</sup> See also *United States v. Neill*, 166 F.3d 943, 949–50 (9th Cir. 1999) (finding that pepper spray causes "extreme pain" and is "capable of causing 'protracted impairment of a function of a bodily organ'" as well as lifelong health problems such as asthma).

<sup>7</sup> See also *Hamilton v. City of Olympia*, 687 F.Supp.2d 1231, 1242–43 (W.D. Wash. 2009) (holding that police use of pepper spray against anti-war demonstrators was an unreasonable use of force).

ii. *ICE Detention Standards Violations*

Under the 2011 PBNDS, the use of force in detention facilities should never be used as punishment, and should involve only the degree necessary and reasonable to gain control of a detainee or provide for self-defense or defense of a third person.<sup>8</sup> GEO staff's use of force against the detainees was unnecessary and unreasonable, in clear violation of ICE's detention standards.

Although pepper spray is an authorized intermediate force weapon under the 2011 PBNDS, it is only permitted where a detainee: (a) is armed and/or barricaded; or (b) cannot be approached without danger to self or others; and (c) a delay in controlling the situation would seriously endanger the detainee or others, or would result in a major disturbance or serious property damage.<sup>9</sup> Here, the use of pepper spray against the detainees was not necessary given that (a) the detainees were not armed or barricaded; (b) they were quietly sitting down with their arms interlocked, and could therefore be approached without danger to themselves or others; and (c) any delay in controlling the peaceful protest would not have seriously endangered the detainees or others or resulted in a major disturbance or serious property damage.

Because GEO staff could have safely and quickly removed the detainees using less severe methods, the physical assault the detainees endured was unnecessary, unreasonable, and in violation of the detention standards.

B. Facility Staff Retaliated Against the Hunger Strikers for Exercising Their First Amendment Rights

We have received reports that GEO and ICE officials have engaged in several retaliatory practices against the detainees who participated in the hunger strike in violation of their First Amendment rights and ICE detention policies.

i. *Threats of Transfer*

According to reports, the detainees were visited by a facility staff member around June 12<sup>th</sup> who informed the detainees that they could be transferred to another detention facility if they continued the hunger strike. This statement appears to be a retaliatory threat in response to the detainees exercising their free speech rights under the First Amendment.

Detainees retain First Amendment rights to free speech, and to be free from retaliation for the exercise of their right to free expression.<sup>10</sup> In a long line of cases, the Ninth Circuit has

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<sup>8</sup> 2011 PBNDS, *supra* note 1, at § 2.15(V)(A)(1).

<sup>9</sup> *Id.* at § 2.15(V)(G)(3).

<sup>10</sup> *Schroeder v. McDonald*, 55 F.3d 454, 461 (9th Cir. 1995). *See also Pell v. Procunier*, 417 U.S. 817 (1974); *Barnett v. Centoni*, 31 F.3d 813, 815–16 (9th Cir. 1994).

recognized that prison officials cannot transfer a prisoner to another prison in retaliation for the prisoner's exercise of his First Amendment rights.<sup>11</sup>

*ii. Threats to Inform Immigration Judges*

The detainees who participated in the hunger strike have reportedly been threatened with having their participation in the hunger strike be revealed to the Immigration Judge presiding over their bond and removal hearings.

To the extent that these threats are intended to coerce detainees into stopping their hunger strike, such retaliatory threats chill detainees' free speech, in clear violation of detainees' First Amendment rights.<sup>12</sup> These reported retaliatory actions against the detainees also violate ICE's own detention policies. The detention standards provide that Adelanto detainees have the right to pursue a grievance without fear of retaliation.<sup>13</sup> According to the standards, detention facility staff shall not harass, discipline, punish or otherwise retaliate against a detainee who files a complaint or grievance.<sup>14</sup> Further, the standards indicate that staff shall not permit a detainee to be subjected to retaliation for seeking judicial or administrative relief or investigation of their conditions of confinement while in detention.<sup>15</sup>

*iii. Food-Based Taunts*

We are also troubled by reports that facility staff have taunted detainees who participated in the hunger strike with platters of food. To the extent the taunts attempt to punish detainees for engaging in a hunger strike, it raises significant First Amendment concerns. As detailed above, detainees' right to protest their conditions of confinement by participating in a hunger strike without retaliation is protected under the First Amendment and ICE detention standards. Moreover, only trained medical, mental health or hospital staff shall offer counseling regarding a detainee's participation in a hunger strike.<sup>16</sup>

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<sup>11</sup> *Rizzo v. Dawson*, 778 F.2d 527, 531-32 (9th Cir. 1985); *see also Gomez v. Vernon*, 255 F.3d 1118, 1127 (9th Cir. 2001) (holding that "repeated threats of transfer because of [the plaintiff's] complaints about the [prison] library" were sufficient to ground a retaliation claim); *Silva v. Di Vittorio*, 658 F.3d 1090, 1105 (9th Cir. 2011) (holding that prisoner's transfer for filing grievances and seeking access to legal process satisfied the pleading requirements of a retaliation claim); *Rhodes v. Robinson*, 408 F.3d 559, 568 (9th Cir. 2005) (holding that prison officers' threats of transfer in response to prisoner filing grievances and pursuing civil rights litigation chilled prisoner's First Amendment rights).

<sup>12</sup> *See Brodheim v. Cry*, 584 F.3d 1262, 1274 (9th Cir. 2009) (holding that a prisoner may prevail on a First Amendment claim based on a general threat that is not carried out if that threat would chill the protected activity of an ordinary prisoner); *see also Watison v. Carter*, 668 F.3d 1108, 1115 (9th Cir. 2012) (holding that prison staff's retaliatory interference with inmate's parole hearing as a response to inmate filing grievances against officer was sufficient to state a First Amendment retaliation claim).

<sup>13</sup> 2011 PBNDS, *supra* note 1, at § 3.1(V)(B).

<sup>14</sup> *Id.* at § 3.1(V)(G).

<sup>15</sup> *Id.* at § 6.3(V)(O).

<sup>16</sup> *Id.* at § 4.2(II)(5).

iv. *Blocking Detainees' Access to Telephone Calls*

Finally, we have received reports that facility staff are preventing the detainees from making outside calls, including to attorneys, that some numbers are blocked to detainees, and that attorneys and their staff have been denied a private space to conduct confidential legal visits with detainees. These actions are in clear violation of the detention standards. According to the detention standards, ICE facilities should ensure that detainees maintain ties with their families and others in the community, including legal representatives, by providing them with reasonable and equitable telephone services.<sup>17</sup> Moreover, detainees and their legal counsel shall be able to communicate effectively with each other, and telephone access procedures shall foster legal access and confidential communications with attorneys.<sup>18</sup> Finally, ICE detention standards require that “[v]isits between legal representatives or legal assistants and individual detainees are confidential and shall not be subject to auditory supervision” and that facilities provide a means for detainees to exchange documents with legal representatives or legal assistants during such visits.<sup>19</sup>

There is nothing in the detention standards that authorizes facility staff to eliminate phone access for detainees engaged in a peaceful protest. According to the standards, a facility may restrict the number and duration of general telephone calls only (1) when required by the volume of detainee telephone demand, (2) in order to ensure orderly facility operations, and (3) in case of emergency.<sup>20</sup> There is nothing to indicate that preventing the detainees from accessing telephone calls is required for any of these reasons. Further, blocking access to legal calls is prohibited by ICE detention standards, which state: “A facility may place reasonable restrictions on the hours, frequency and duration of [legal calls] but may not otherwise limit a detainee’s attempt to obtain legal representation.”<sup>21</sup> Additionally, to the extent that the facility is blocking detainees’ access to counsel, such an interference would violate detainees’ right to communicate with counsel protected by the INA and the Constitution.

\* \* \*

We urge ICE and GEO management to take steps to remedy the physical assault and retaliation against detainees engaged in a hunger strike. Specifically, ICE and GEO should:

1. Immediately end the ongoing retaliatory actions and threats against the detainees.
2. Initiate disciplinary proceedings for facility staff responsible for the assault of detainees on June 12 and subsequent retaliatory acts and threats against the detainees.
3. Schedule a meeting with GEO and ICE management and the detainees to discuss their mistreatment and the grievances that led them to initiate a hunger strike. Such a meeting should include all the nine detainees, as well as their legal counsel.

---

<sup>17</sup> *Id.* at § 5.6(I).

<sup>18</sup> *Id.* at § 5.6(II)(4) & 5.6(II)(6).

<sup>19</sup> 2011 ICE PBNDS, *supra* note 1, § 5.7(J)(9) & 5.7(J)(10).

<sup>20</sup> *Id.* at 362.

<sup>21</sup> 2011 ICE PBNDS, *supra* note 1, § 5.6(F)(1).



We look forward to your prompt attention to these serious issues. We request that ICE and GEO inform us as to what steps they intend to take to address the mistreatment of the hunger strikers by July 3, 2017. Should you have any questions, please contact Michael Kaufman at [mkaufman@aclusocal.org](mailto:mkaufman@aclusocal.org) or (213) 977-5232.

Sincerely,

Michael Kaufman  
Senior Staff Attorney  
ACLU of Southern California

**P000010**

# EXHIBIT 49

DECLARATION OF HUSSAIN TURK

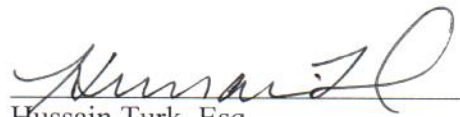
I, Hussain Turk, do hereby affirm the following of my knowledge:


1. My name is Hussain Turk, I am an attorney at the Los Angeles HIV Law and Policy Project in Los Angeles, California. I graduated from the University of California, Los Angeles School of Law in May of 2016, and am barred by the State of California (SBN 314704).
2. On June 17, 2017, I traveled to the Adelanto Detention Facility at the request of Attorney Nicole Ramos, counsel for Mr. Omar Rivera Martinez (A# 213 081 649) and Mr. Josue Mateo Lemus Campos (A# 213 078 965).
3. I met with Mr. Rivera Martinez in a legal visiting room. I observed at least 30 separate scratches on his upper body ranging in length from one to several inches. I also observed Mr. Rivera Martinez's mouth, and noted that his upper right lateral cuspid tooth was missing, as well as a missing crown from his bottom left second bicuspid tooth.
4. His nose is visibly fractured and off-set to the left side of his face by several millimeters. He had bruising on his right wrist where they had handcuffed him very tightly. He appeared frightened and in pain. I twice asked Officer Ruiz to remove Mr. Rivera Martinez's handcuffs during our meeting. I was informed that Lieutenant Bowdrie had ordered him to remain handcuffed because he was being disciplined. When asked why Mr. Rivera Martinez was being disciplined, a bearded white male officer with a tattooed sleeve on his left forearm made an exaggerated air-quote gesture and stated "for inciting a group protest." I perceived his tone and gesture to imply a skepticism regarding the underlying violation for which Rivera-Martinez was being disciplined. Despite my repeated requests, and despite Mr. Rivera Martinez clearly weakened physical and mental states, he remained handcuffed throughout the entire duration of our meeting, which was approximately 75 minutes.
5. When the bearded white male officer with the tattooed sleeve on his left forearm made the exaggerated air-quotes gesture by raising both hands in the air and dually flexing his index and middle fingers while simultaneously stating "for inciting a group protest" it was my firm belief and understanding that the Officer was implying that Mr. Rivera Martinez was being inappositely and disproportionately punished for engaging in a silent and peaceful hunger strike. My understanding as such is based on the widely accepted social use of the Officer's gesture to commonly invoke sarcasm or skepticism with regards to the matter being air-quoted. As such, it seemed apparent to me that this Officer in particular knew or had some reason to believe that Mr. Rivera Martinez's rights were being violated.
6. Mr. Rivera Martinez reported to making numerous verbal and written requests for medical care because he has experienced extreme difficulty breathing as a result of his

nose being fractured. He reported that he is now in so much pain that he cannot sleep, and that he is too afraid of further torture to keep asking for medical treatment.

7. Also, on this date, I met with Mr. Lemus Campos. Prior to meeting with Mr. Lemus Campos I was informed by Officer T. Johnson that I could not visit with Mr. Lemus Campos in a contact visitation room because Mr. Lemus Campos was being disciplined. Officer Johnson indicated that the facility had "made a mistake" in allowing me to visit with Mr. Rivera Martinez in a contact visitation room because he too was being punished. I asked to see this policy in their operations handbook. Officer T. Johnson spent approximately five ("5") minutes reviewing a Geo guidebook and was unable to locate this policy. Officer T. Johnson then sent me to the front lobby where she said I could meet with the Lieutenant to review this policy. I waited in the front lobby, but the Lieutenant never arrived and nobody was able to produce any written evidence of the existence of the policy in question.
8. My meeting with Mr. Lemus Campos took place in a no-contact visiting area with a soundproof glass barrier using a telephone. This meeting was not private. There were guards present within earshot of my meeting with Mr. Lemus Campos. I informed the guards that Mr. Lemus Campos was entitled to a private space to preserve attorney-client confidentiality but they refused to comply with this request. Mr. Lemus Campos looked visibly uncomfortable with the fact that the guards refused to leave.
9. Both Mr. Lemus Campos and Mr. Rivera Martinez reported being pepper sprayed profusely in their faces, and specifically, in Mr. Lemus Campos's genitals. Mr. Lemus Campos and Mr. Rivera Martinez stated that the guards forced them to shower with hot water to make the experience more painful for them, and then laughed at them while they showered.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct to the very best of my knowledge. Executed on June 23, 2017 at Los Angeles, California.

  
Hussain Turk, Esq.

  
June 23, 2017



# EXHIBIT 50

# ICE

## SOLICITUD DEL DETENIDO

JUN 22 2017

OFICIAL DE DEPORTACION RANKS

NOMBRE DEL DETENIDO Alexander Antonio Rusgas Mejia  
 NUMERO A- 213081704 NACIONALIDAD Honduras  
 NUMERO DE REDISTRO W4 DORMITORIO/ CAMA B 3071U

- ☐ Cuando es mi próxima cita a corte?
- ☐ Califico para una fianza?
- ☐ Quisiera solicitar una reducción a mi fianza de: \_\_\_\_\_
- ☐ Cuando seré deportado? Recibí la orden de deportación el: \_\_\_\_\_
- ☐ Cuando puedo ser deportado? ☐ Quisiera ser deportado lo más pronto posible.
- ☐ Soy elegible para una Salida Voluntaria?
- ☐ Califico para Libertad Condicional? ☐ Cual es el estado de mi solicitud de Libertad Condicional?
- ☐ Tengo documentos para mi solicitud de Libertad Condicional (explique al final de la pagina)
- ☐ Ya tengo una Orden de Deportación. Cuando tendrá lugar mi revisión de custodia?  
☐ Cual es el estado de la revisión?
- ☐ Cuando podre ver al representante del Consulado?
- ☐ Necesito una copia de mi: ☐ Aviso para comparecer ☐ \_\_\_\_\_
- ☐ Tengo algunos documentos que añadir en mi expediente (explique al final de la pagina)
- ☐ Asuntos de propiedades (explique al final de la pagina) ☐ Me falta \_\_\_\_\_ de \_\_\_\_\_
- ☐ Otros (explique al final de la página)

Por favor, especifique detalladamente: un cordial saludo a usted y  
motivo que le estoy escribiendo es por que aqui en la situacion  
delante la que nos tan asiendo ami y a mis compañeros es absurdo  
no es justo que despues de todo nos sigan amillantones

Respuesta del Oficial: Make request to Judge

FIRMA DEL OFICIAL WLB FECHA 6/22/17

☐ Interview ☐ Interpreter Interviewed: \_\_\_\_\_

☐ Written Response Only Received: \_\_\_\_\_

ADE-DETAINEE  
08-2011

GEO 00916

## SOLICITUD DEL DETENIDO

OFICIAL DE DEPORTACION

QUEVEDO  
6/23/17

NOMBRE DEL DETENIDO: Isaac Antonio Lopez Castillo

NUMERO A-213081603

NACIONALIDAD: Salvadoreña (E)

NUMERO DE REDISTRO

DORMITORIO/ CAMA W4 C 204 20

☐ Cuando es mi próxima cita a corte?☐ Califico para una fianza?☐ Quisiera solicitar una reducción a mi fianza de: \_\_\_\_\_☐ Cuando seré deportado? Recibí la orden de deportación el: \_\_\_\_\_☐ Cuando puedo ser deportado? ☐ Quisiera ser deportado lo más pronto posible.☐ Soy elegible para una Salida Voluntaria?☐ Califico para Libertad Condicional? ☐ Cual es el estado de mi solicitud de Libertad Condicional?☐ Tengo documentos para mi solicitud de Libertad Condicional (explique al final de la pagina)☐ Ya tengo una Orden de Deportación. Cuando tendrá lugar mi revisión de custodia?☐ Cual es el estado de la revisión?☐ Cuando podre ver al representante del Consulado?☐ Necesito una copia de mi: ☐ Aviso para comparecer ☐ \_\_\_\_\_☐ Tengo algunos documentos que añadir en mi expediente (explique al final de la pagina)☐ Asuntos de propiedades (explique al final de la pagina) ☐ Me falta \_\_\_\_\_ de \_\_\_\_\_☐ Otros (explique al final de la pagina)

Por favor, especifique detalladamente: El grupo de adelante oq solicitamos tener una platica con "Ice" en el cual estemos presente todos los del grupo y un abogado, y les recordamos que este dia comulamos las 48 horas de nuestra huelga pacifica de hambre.

Respuesta del Oficial:

DUPURATE

Firma del Oficial

QUEVEDO

FECHA

06/26/17

☐ Interview ☐ Interpreter Interviewed:☒ Written Response Only Received:ADE-DETAINEE  
08-2011

# EXHIBIT 51





Rigo Martinez <asstnicoleros@gmail.com>

---

**Fwd: Adelanto Facility - Block on Counsel's Telephone Number - Omar Arnold Rivera Martinez (A# 213 081 649) / Jose Mateo Lemus Campos (A#213 078 965)**

1 message

---

**Nicole Ramos** <nicole@alotrolado.org>

Wed, Jul 5, 2017 at 9:48 AM

To: Rigo Martinez <asstnicoleros@gmail.com>

----- Forwarded message -----

From: **Nicole Ramos** <nicole@alotrolado.org>

Date: Wed, Jul 5, 2017 at 9:24 AM

Subject: Adelanto Facility - Block on Counsel's Telephone Number - Omar Arnold Rivera Martinez (A# 213 081 649) / Jose Mateo Lemus Campos (A#213 078 965)

To: "Gabriel.A.Valdez@ice.dhs.gov" <Gabriel.A.Valdez@ice.dhs.gov>, CHRISTOPHER.BARTH@ice.dhs.gov, david.w.jennings@ice.dhs.gov

Good morning,

On July 1st, I learned that my telephone number has been blocked such that my clients (referenced above), are not able to contact me.

On that date, I contacted Telmate, and learned that the block originated with the institution. Following, I contacted the facility, but I was advised to call back on Monday.

On July 3rd, I spoke with Lieutenant Belt of the Adelanto Detention Facility regarding the block. Lieutenant Belt advised that someone would respond to my request for information and resolution later that day.

In the afternoon, I received a voicemail message from Lieutenant Belt stating that he was not *authorized* to discuss this matter further, and that I had to seek resolution by contacting ICE, the Office of Chief Counsel, or the Warden's Office.

This morning, I contacted the Adelanto Detention Facility and requested to speak with the warden or the warden's assistant. I was transferred by the front desk to the warden's assistant, "Joanne," who declined to provide her full name. "Joanne" indicated that no one at the facility could respond to my inquiry. "Joanne" indicated that the only officials with the authority to place a block on my phone number are ICE.

Please advise when this will be resolved. I have not initiated any three-way calls using the Telmate system, nor engaged in conduct which violates program rules. Both clients are Salvadoran asylum seekers, and the blocking of their access to counsel violates their rights under the *Orantes* injunction.

Thank you,

Nicole Ramos

*(Admitted in NY - practice consists exclusively of federal immigration matters)*

[Linkedin profile available at this link](#)

Nicole Ramos, Project Director  
Border Rights Project, Al Otro Lado  
511 E. San Ysidro Blvd., # 333  
San Ysidro, CA 92173  
(664) 526-0145 (MX)  
(619) 786-4866 (USA)

**P000161**



*"A lawyer is either a social engineer or a parasite on society."*

*Charles Hamilton Houston*

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*"En la sociedad, un abogado es un ingeniero social o un parásito"*

*Charles Hamilton Houston*

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(Admitted in NY - practice consists exclusively of federal immigration matters)

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*"A lawyer is either a social engineer or a parasite on society."*

*Charles Hamilton Houston*

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este mensaje a su destinatario, se le notifica que cualquier diseminación o duplicación de este correo electrónico es estrictamente prohibido.  
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# EXHIBIT 52

## **Standard Intergovernmental Service Agreement (IGSA)**

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EROIGSA-11-0003

**EROIGSA-11-0003**  
**INTERGOVERNMENTAL SERVICE AGREEMENT**  
**BETWEEN THE**  
**UNITED STATES DEPARTMENT OF HOMELAND SECURITY**  
**U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT**  
**OFFICE OF ENFORCEMENT AND REMOVAL OPERATIONS**  
**AND**  
**THE CITY OF ADELANTO**

This Intergovernmental Service Agreement ("Agreement") is entered into between United States Department of Homeland Security Immigration and Customs Enforcement ("ICE"), and the City of Adelanto, ("Service Provider") for the detention and care of aliens ("detainees"). The term "Parties" is used in this Agreement to refer jointly to ICE and the Service Provider.

**FACILITY LOCATION:**

The Service Provider shall provide detention services for detainees at the following institution(s):

**City of Adelanto**  
**10400 Rancho Road**  
**Adelanto, CA 92301-2237**

The following constitutes the complete agreement:

- Intergovernmental Service Agreement (IGSA)
- Appendix A - Statement of Work
- Appendix B - ICE Design Standards
- Appendix C - Structured Cable Plant Standard
- Appendix D - Performance Requirements Summary
- Appendix E - Quality Assurances Surveillance Plan (QASP)
- Appendix F - Title 29, Part 4 Labor Standards for Federal Service Contract Clause
- Appendix G - Wage Determination Number: 2011-0013, Rev 1 Dated 02/18/2011

**IN WITNESS WHEREOF**, the undersigned, duly authorized officers, have subscribed their names on behalf of the City of Adelanto and Department of Homeland Security, U.S. Immigration and Customs Enforcement.

**ACCEPTED:**

U.S. Immigration and Customs Enforcement  
b6, b7c  
Contracting Officer

b6, b7c

Signature: \_\_\_\_\_

Date: 5-27-11

**ACCEPTED:**

City of Adelanto  
D. James Hart, PH.D.  
City Manager/Executive Director

Signature: \_\_\_\_\_

Date: 5/13/11